# IMPORTERS' QUESTIONNAIRE SEBACIC ACID FROM CHINA

Return completed questionnaire to:

#### UNITED STATES INTERNATIONAL TRADE COMMISSION

Office of Investigations, Room 615 500 E Street, SW, Washington, DC 20436

#### So as to be received by the Commission by no later than October 14, 2004

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its five-year review concerning sebacic acid from China (inv. No. 731-TA-653 (Second Review)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your possession (19 U.S.C. § 1333(a)).

Name of firm			_
Address			
City	State	Zip code	
World Wide Web address			_
Has your firm imported sebacic acid (as defined in the instruction 1998?	booklet) from any co	ountry at any time since January 1,	
NO (Sign the certification below and promptly return only	this page of the que	estionnaire to the Commission)	
YES (Read the instruction booklet carefully, complete all p the entire questionnaire to the Commission)	parts of the questionn	aire, sign the certification, and return	
certify that the information herein supplied in response to this questivelief and understand that the information submitted is subject to authorized and understand that the information submitted is subject to authorized in this certification I also grant consent for the Commission, or the same or similar merchandise. (If you do not contacknowledge that information submitted in this questionnaire response employees, and contract personnel who are acting in the capacity ecords of this review or related proceedings for which this information the programs and operations of the Commission pursuant to 5 U.S. Con-disclosure agreements.	dit and verification b and its employees and ther import-injury i sent to such use, ple nse and throughout i y of Commission em on is submitted, or in	by the Commission.  If contract personnel, to use the informinvestigations or reviews conducted wase note the certification accordingly this review may be used by the Commisployees, for developing or maintaining internal audits and investigations research.	mation by the y.) sission, ing the elating
Jame and Title of Authorized Official	Date		
ignature of Authorized Official	( <u>)</u> Phone	Fax	

#### PART I.-GENERAL QUESTIONS

The questions in this questionnaire have been reviewed with market participants to ensure that issues of concern are adequately addressed and that data requests are sufficient, meaningful, and as limited as possible. Public reporting burden for this questionnaire is estimated to average 25 hours per response, including the time for reviewing instructions, searching existing data sources, gathering the data needed, and completing and reviewing the questionnaire. Send comments regarding the accuracy of this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, to the Office of Investigations, U.S. International Trade Commission, 500 E Street, SW, Washington, DC 20436.

reply to this questionnaire		the cost to yo	ur firm of prepari	ng the
		hours	doll	ars
	omments you may have for improvious. Please attach such commen			
	ess of establishment(s) covered by reporting guidelines). If your firn ding symbol.			
Is your firm owned in who	ole or in part, by any other firm?			
□No □YesL	ist the following information.	_		
Firm name	Address	_	Extent of ownership	
	elated firms, either domestic or for in China into the United States or the United States?			
importing sebacic acid from sebacic acid from China to	n China into the United States or			

# PART I.--GENERAL QUESTIONS--Continued

∐No ∐Y	YesList the following information.	
Country/firm name	<u>Address</u>	Affiliation
Does your firm have production of sebacic	any related firms, either domestic or acid?	foreign, which are engaged in th
∐No ∐Y	esList the following information.	
Firm name	<u>Address</u>	<u>Affiliation</u>
		ions on sebacic acid. More than as title to the imported product(s)
answer may be application Importer of recording Consignee of the If your firm is an imp	able.  Take	es title to the imported product(s) oms broker or freight forwarder  not the consignee, please list the
answer may be applicated and applicated and applicated answer may be applicated and applicated answer may be applicated and applicated and applicated and applicated and applicated answer may be applicated and applicated a	Take imported product(s)  Custo orter of record of sebacic acid but is mpany name, address, telephone, an	oms broker or freight forwarder  not the consignee, please list the dindividual to contact).
answer may be application of the Importer of the If your firm is an improconsignees below (consignees below (consignees below).	Take imported product(s)  Customerer of record of sebacic acid but is mpany name, address, telephone, and er your firm enters sebacic acid into	oms broker or freight forwarder  not the consignee, please list the dindividual to contact).
answer may be applicated and applicated and applicated answer may be applicated and applicated answer may be applicated and applicated and applicated and applicated and applicated answer may be applicated and applicated a	Take imported product(s)  Customerer of record of sebacic acid but is mpany name, address, telephone, and er your firm enters sebacic acid into	oms broker or freight forwarder  not the consignee, please list the dindividual to contact).

## PART I.--GENERAL QUESTIONS--Continued

I-10.	Please indicate whether your firm imports sebacic acid under the TIB (temporary importation under bond) program.						
	□ No □ Yes						
I-11.	In Parts II and III of this questionnaire we request a copy of your company's business plan. Does your company or any related firm have a business plan or any internal documents that describe, discuss, or analyze expected future market conditions for sebacic acid?						
	No YesPlease provide the requested documents. If you are not providing the requested documents, please explain why not.						
I-12.	To your knowledge, has sebacic acid been the subject of any other import relief investigations in the United States or in any other countries?						
	No YesPlease specify.						
PART	IITRADE AND RELATED INFORMATION						
	r information on this part of the questionnaire can be obtained from Jai Motwane (202-205-3176 or twane@usitc.gov). <b>Supply all data requested on a <u>calendar-year</u> basis.</b>						
II-1.	Who should be contacted regarding the requested trade and related information?						
	Company contact: Name and title						
	Phone No. E-mail address						

<u>Note.</u>—For questions II-2, II-3, and II-4, please supply details as to the time, nature, and significance of any relevant changes in the character of your operations, and provide underlying assumptions, along with relevant portions of business plans or other supporting documentation, that address the issues raised.

Does		n anticipate a	any changes	in the ch	aracter of	your opera	ations or o	organization (
note	d above) 1	relating to the	importatio	n of seba	cic acid ir	the future	?	
note	d above) 1	relating to the	importatio	n of seba	cic acid ir	the future	?	
-								
note	d above) 1		e importatio	n of seba	cic acid ir			or organization atidumping du
	No	YesS	supply the re	equested o	letails and	d documen	tation (se	ee note above)

□ No	2004?  YesIndicate when such orders are to be delivered and the quantities in
-	Iso produces sebacic acid in the United States, please indicate your reasons for product. If your reasons differ by source, please elaborate.
□No	m produce sebacate esters from imported sebacic acid?  YesList the following information.
Type of ester	% of total 2003 ester produced by the second
Are you alway	ys aware of the country of origin of sebacic acid imported by your firm?
∐ No	Yes-Briefly describe your method(s) for determining country of origing your imports of sebacic acid.

II-10a. <u>IMPORTS BY SOURCE</u> Report your sebacic acid imported by your firm during <u>separately</u> for China and for all other sidentify whether you are reporting data provided.	g 1998-2003 ources <u>com</u>	. (See defini bined. Phot	tions in the i	instruction be any pages as	ooklet.) <b>Rep</b> s you need a	
China (other than from Hengshui Dongfeng Chen	nical Co., Ltd	and Sinocher	m Tianjin Imp	ort & Export	Corp.)	
Hengshui Dongfeng Chemical Co., Ltd./Sinochem	Tianjin Impo	ort & Export C	Corp. (China)	All ot	her sources co	ombined <sup>1</sup>
( <i>Quantity</i> in 1,	000 pounds	s, <i>valu</i> e in \$1	1,000)	_		
Item	1998	1999	2000	2001	2002	2003
BEGINNING-OF-PERIOD INVENTORIES (quantity)						
IMPORTS: <sup>2</sup>		T	_	_		
Quantity of imports						
Value of imports						
U.S. SHIPMENTS:						
Commercial shipments:						
Quantity of commercial shipments						
Value of commercial shipments						
Internal consumption/company transfers:						
Quantity of internal consumption/transfers						
Value <sup>3</sup> of internal consumption/transfers						
EXPORT SHIPMENTS:⁴						
Quantity of export shipments						
Value of export shipments						
END-OF-PERIOD INVENTORIES <sup>5</sup> (quantity)						
U.S. SHIPMENTS TO DISTRIBUTORS (quantity)						
U.S. SHIPMENTS TO END USERS (quantity)						
<sup>1</sup> Please identify these sources:						
<sup>2</sup> Please identify the foreign producers, if known:						
<sup>3</sup> Sales to related firms (including internal consumption basis for valuing these sales within your company, please s that basis for 1998-2003 below:	) must be va	alued at fair n pasis (e.g., co	narket value. ost, cost plus	In the even , etc.) and pr	t that you use ovide value	e a different data using
<sup>4</sup> Identify your principal export markets:						
<sup>5</sup> Reconciliation of dataPlease note that the <b>quantitio</b> inventories, plus imports, less total shipments, equals end-continuously Yes NoPlease explain:	of-period inv	entories. Do	the data rep	orted recond	ile?	eriod

Import & Export Corp. (Chin ounds, value in \$1,000) January-June 2003	All other sources com  January-June 2004
	January-June 2004
January-June 2003	January-June 2004
	ities reported above should shipments, equals end-of-pe

-11.	Describe the significance of the existing antidumping duty order covering imports of sebacic acid from China in terms of its effect on your firm's imports, U.S. shipments of imports, and inventories. You may wish to compare your firm's operations before and after the imposition of the order.
[-12.	Did your firm undertake any changes in its imports, U.S. shipments of imports, or inventories of sebacic acid as a result of revocation of the antidumping order on sebacic acid with respect to
	Hengshui Dongfeng Chemical Co., Ltd., and Sinochem Tianjin Import & Export Corp.?  No YesSupply details as to the time, nature, and significance of such changes.
-13.	Would your firm anticipate any changes in its imports, U.S. shipments of imports, or inventories of sebacic acid in the future if the antidumping duty order on sebacic acid from China were to be revoked?
	No YesSupply details as to the time, nature, and significance of such changes and provide underlying assumptions, along with relevant portions of business plans or other supporting documentation, for any trends or projections you may provide.

#### PART III.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Edward Wilson (202-205-3268 or edward.wilson@usitc.gov).

III-1.	Who should be con	tacted regarding the requested pricin	g and related information?
	Company contact:		
	1 2	Name and title	
		Phone No.	E-mail address

#### Section III-A.--PRICE DATA

This section requests quarterly quantity and value data on your firm's U.S. shipments of the following sebacic acid products imported from China and sold to unrelated U.S. customers during January 1998-June 2004. Values should be for arms-length sales to unrelated U.S. customers, f.o.b. U.S. point of shipment, net of returns, refunds, discounts, and credits. (Please note that quantity and value data in this part are requested in actual pounds and dollars, not thousands of pounds and thousands of dollars).

<u>Product 1</u>.—Sebacic acid with a minimum of 99.5% purity; 0.08 maximum ash content; 0.50 maximum moisture content; melting point between 132.0-134.0 decrees Celsius; 50 maximum color (APHA); 544 mg minimum acid value (KOH/g); and 97.0 minimum carbon as  $C_{10}$ . (This sebacic acid product is light in color and is a white free flowing crystalline or prill).

<u>Product 2</u>.--Sebacic acid with a minimum of 99.5% purity; 0.05 maximum ash content; 0.50 maximum moisture content; melting point between 132.0-134.0 decrees Celsius; 50 maximum color (APHA); 544 mg minimum acid value (KOH/g); and 97.0 minimum carbon as  $C_{10}$ . (This sebacic acid product is exceptionally light in color and is a white free flowing crystalline or prill).

<u>Product 3</u>.--Sebacic acid with a minimum of 99.5% purity; 0.01 maximum ash content; 0.50 maximum moisture content; melting point between 132.0-134.0 decrees Celsius; 50 maximum color (APHA); 544 mg minimum acid value (KOH/g); and 97.0 minimum carbon as  $C_{10}$ . (This sebacic acid product is exceptionally light in color and is a white free flowing crystalline and is manufactured under GMP protocol).

**COPY THE FOLLOWING PAGE AS NECESSARY.** Complete a separate page for each of the specified products imported from China and sold by your firm in the U.S. market. Indicate in the space provided at the top of the page the product for which pricing is being reported.

NOTE: IF YOUR PRODUCT DOES NOT EXACTLY MEET THE PRODUCT SPECIFICATIONS LISTED ABOVE BUT IS COMPETITIVE WITH ONE OF THE SPECIFIED PRODUCTS, PROVIDE A DESCRIPTION OF YOUR PRODUCT AND CHECK THE BOX AT THE TOP OF THE FOLLOWING PAGE INDICATING WHICH OF THE SPECIFIED PRODUCTS IT IS COMPETITIVE WITH. THEN REPOT DATA FOR YOUR PRODUCT.

## Section III-A.--PRICE DATA--Continued

Copy this page and report separately for each pro-	duct grade/type, <u>and</u> each Chinese supplier
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	Product 1 Product 2	Product 3					
	Chinese supplier:						
	(Quantity in pounds, value in dollars)						
	Period of shipment	Quantity	Value <sup>1</sup>				
1998:							
	January-March						
	April-June April-June						
	July-September						
	October-December						
1999:		Т					
	January-March						
	April-June						
	July-September						
	October-December						
2000:		_					
	January-March						
	April-June						
	July-September						
	October-December						
2001:		_					
	January-March						
	April-June						
	July-September						
	October-December						
2002:		Т					
	January-March						
	April-June						
	July-September						
	October-December						
2003:		<del></del>					
	January-March						
	April-June						
	July-September						
	October-December						
2004:		<u></u>					
	January-March						
	April-June						
NoteIf your product does not exactly meet the product specifications but is competitive with the specified product, provide a description of your product:  1 Net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods), f.o.b. your U.S. point of shipment.  NoteIf your product does not exactly meet the product specifications but is competitive with the specified product, provide a description of your product:							

#### Section III-B.--PRICE-RELATED QUESTIONS

III-B-1.	(transaction by transaction negotiation, contracts for multiple shipments, set price lists. If your firm issues price lists, please include a copy of a recent price list with your sub. If your price list is large, please submit sample pages.			
III-B-2.	Please describe your firm's discount police etc.).	cy (quantity discounts, annual total volume discounts,		
III-B-3.	What are your firm's typical sales terms f	For sebacic acid imported from China (e.g., 2/10 net		
	30 days)? On what basis are your prices of such product usually quoted (e.g., f.o.b. port of entry, or delivered)?			
III-B-4.	Approximately what share of your firm's sales of its sebacic acid imported from China in 2003 were on a (1) long-term contract basis (multiple deliveries for more than 12 months), (2) short-term contract basis (multiple deliveries up to 12 months), and (3) spot sales basis (for a single delivery)?			
	Type of sale	Share of sales (percent)		
Long-te	rm contracts			
Short-te	erm contracts			
Spot sal	es			
III-B-5.	If you sell on a long-term contract basis, provisions of a typical long-term contract	please answer the following questions with respect to		
	(a) What is the average duration of a cont	ract?		
	(b) Can prices be renegotiated during the	contract period?		
	(c) Does the contract fix quantity, price, of	or both?		
	(d) Does the contract have a meet or relea	se provision?		

III-B-6. If you sell on a short-term contract basis, please answer the following questions with r to provisions of a typical short-term contract.				
	(a) What is the average duration of a contract?			
	(b) Can prices be reneg	gotiated during the contract period? _		
	(c) Does the contract f	ix quantity, price, or both?		
	(d) Does the contract h	have a meet or release provision?		
III-B-7. What is the average lead time between a customer's order and the date of delivery for firm's sales of sebacic acid?				
	Source	Share of 2003 sales	Lead time	
From in	ventory			
Produce	d to order			
Total		100%		
III-B-8. (a) What is the approximate percentage of the total delive accounted for by U.S. inland transportation costs?				
	(b) Who generally arranges the transportation to your customers' locations? Your firm or purchaser (check one).			
	(c) What proportion of your sales occur within 100 miles of your storage or production facility? percent. 101 to 1,000 miles? percent. Over 1,000 miles? percent.			
III-B-9.	What is the geographic market area in the United States served by your firm's sebacic acid?			
	□ Northeast □ Mid-Atlantic □ Midwest □ Southeast			
	Southwest Rocky Mountains West Coast Northwest			
	National Other (describe)			

III-B-10.	Describe the end uses of the sebacic acid that you import from China. For each end-use product, what percentage of the total cost is accounted for by sebacic acid?				
	End use		Share of total cost accounted for by sebacic acid (percent)		
		-			
III-B-11.	Indicate the share of your U.S. commercial shipments of sebacic acid from China (if any) accounted for by the following end uses:				
	End use		Share of total U.S. shipments of sebacic acid (percent)		
	Nylon	_			
	Plasticizer	_			
	Plastic additive	_			
	Resin/coatings/adhesives	_			
	Other:	_			
	Other:	_			
III-B-12.	Have there been any changes in	the end uses of	sebacic acid since 1994?		
	No YesPlease	describe.			
	-				
III-B-13.	Do you anticipate any changes in terms of the end uses of sebacic acid in the future?				
	No YesPlease describe and identify the time period. Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation, that address this issue.				

III-B-14.	(a) Please list in order of importance any products that may be substituted for sebacic acid.			
	(1)	(2)	(3)	
	` '	h possible substitute product, please are substitutes.	give examples of applications	and end uses for
	(c) Have ch	nanges in the prices of these products	affected the price for sebacic	acid?
	No	Yes—To what degree do cha acid? Does this effect have a ti each substitute product? Does end use?	me lag? If so, how long is the	price for sebacic time lag for acid or final
III-B-15.		been any changes in the number or t d since 1994?	ypes of products that can be so	ubstituted for
	No	YesPlease explain.		
III-B-16.	Do you antiacid in the	icipate any changes in terms of the structure?	ubstitutability of other produc	ts for sebacic
	No	YesPlease describe. Prov relevant portions of b documentation, that address this	usiness plans or other support	

III-B-17.	To what extent have changes in the prices of raw materials affected your firm's selling prices for sebacic acid during January 1998-June 2004? Also discuss any anticipated changes in raw material costs in the future, identifying the time period(s) involved and the factor(s) that you believe would be responsible for such changes. Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation, that address this issue.			
III-B-18.	Have any changes occurred in any other factors affecting supply (e.g., changes in availability or prices of energy or labor; transportation conditions; production capacity and/or methods of production; technology; export markets; or alternative production opportunities) that affected the availability of U.Sproduced sebacic acid in the U.S. market since 1994?			
	No YesPlease note the time period(s) of any such changes, the factors(s) involved, and the impact such changes had on your shipment volumes and prices.			
III-B-19.	(a) Do you anticipate any changes in terms of the availability of sebacic acid imported from China in the U.S. market in the future?			
	☐ Increase ☐ No Change ☐ Decrease			
	(b) If you anticipate changes in supply, please identify the changes including the time period and the impact of such changes on shipment volumes and prices. Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation, that address this issue.			
III-B-20.	Has the availability of <u>NONSUBJECT</u> (i.e. non-Chinese) imported sebacic acid changed since 1994?			
	No YesPlease explain.			

#### Section III-B.--MARKET FACTORS

III-B-21.	Describe how easily your firm can shift its sales of sebacic acid between the U.S. market and alternative country markets. In your discussion, please describe any contracts, other sales arrangements, or other constraints that would prevent or retard your firm from shifting sebacic acid between the U.S. and alternative country markets within a 12-month period. Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation, that address this issue.
III-B-22.	Have there been any significant changes in the product range, product mix, or marketing (including sales over the internet) of sebacic acid since 1994?
	No YesPlease describe and quantify if possible.
III-B-23.	Do you anticipate any changes in terms of the product range, product mix, or marketing (including sales over the internet) of sebacic acid in the future? Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation, that address this issue.
	No YesPlease identify, including the time period.
III-B-24.	Do you, or your customers, require your suppliers to become certified or prequalified with respect to the quality, chemistry, strength, or other performance characteristic of the sebacic acid they sell to your firm?
	No Yes percent of purchases in 2003 Yes-all purchases
	Please provide a general description of the certification or qualification process and the time required.

## Section III-B.--<u>MARKET FACTORS</u>--Continued

III-B-25.	5. If you require certification or qualification, briefly describe the factors that you consider when qualifying a new supplier (e.g., quality of product, reliability of supplier, etc.) and estimate the time it takes to certify or qualify a new supplier.			
III-B-26.	Since 1994, have any domestic or foreign producers failed in their attempts to certify or qualify their sebacic acid with your firm or have any producers lost their approved status?  No YesPlease identify these firms, the countries where they are located, and the reasons why they failed the certification/qualification process.			
III-B-27.	How has demand within the United States (and outside the United States, if known) for			
III- <b>D-</b> 27.	sebacic acid changed since 1994?  Increased Unchanged Decreased  Other (describe)			
	What were the principal factors affecting changes in demand?			
III-B-28.	Do you anticipate any future changes in sebacic acid demand in the United States and, if known, the rest of the world?			
	No YesPlease describe and identify the time period. Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation, that address this issue.			

#### Section III-B.--MARKET FACTORS--Continued

III-B-29.	Please compare market prices of sebacic acid in U.S. and non-U.S. markets, if known. Provide specific information as to time periods and regions for any price comparisons.			
III-B-30.	Please provide as a separate attachment to this request any studies, surveys, etc. that you are aware of that quantify and/or otherwise discuss sebacic acid supply (including production capacity and capacity utilization) and demand in (1) the United States, (2) each of the other major producing/consuming countries, including China, and (3) the world as a whole. Of particular interest is such data from 1994 to the present and forecasts for the future.			
III-B-31.	Are your exports of sebacic acid subject to any tariff or non-tariff barriers to trade in other countries?  No YesPlease list the countries and describe any such barriers and any significant changes in such barriers that have occurred since 1994, or that are expected to occur in the future.			
III-B-32.	Does your firm sell sebacic acid over the internet?  No YesPlease describe, noting the estimated percentage of your firm's total sales of sebacic acid in 2003 accounted for by internet sales.			

## Section III-B.--<u>MARKET FACTORS</u>--Continued

III-B-33. Is sebacic acid produced in the United States and in other countries interchangeable (i.e., can they physically be used in the same applications)? Please indicate below, using "A" to indicate that the products from a specified country-pair are <i>always</i> interchangeable, "F" to indicate that the products are <i>frequently</i> interchangeable, "S" to indicate that the products are <i>sometimes</i> interchangeable, "N" to indicate that the products are <i>never</i> interchangeable, and "0" to indicate <i>no familiarity</i> with products from a specified country-pair. <sup>1</sup>				
United States	China	Other countries		
oducing sebacic acid which is e interchangeable use:	sometimes or never interchar	ngeable, please explain the		
	the same applications)? Procuntry-pair are always in the, "S" to indicate that the prare never interchangeable, pair.   United States  oducing sebacic acid which is	the same applications)? Please indicate below, using country-pair are always interchangeable, "F" to indicate, "S" to indicate that the products are sometimes inter are never interchangeable, and "0" to indicate no fam pair.  United States  China  Oducing sebacic acid which is sometimes or never interchangeable.		

#### Section III-B.--MARKET FACTORS--Continued

III-B-34. Are differences other than price (i.e., quality, availability, transportation network, product range, technical support, etc.) between sebacic acid produced in the United States and in other countries a significant factor in your firm's sales of the products? Please indicate below, using "A" to indicate that such differences are <i>always</i> significant, "F" to indicate that such differences are <i>frequently</i> significant, "S" to indicate that such differences are <i>sometimes</i> significant, "N" to indicate that such differences are <i>never</i> significant, and "0" to indicate <i>no familiarity</i> with products from a specified country-pair. 1				
Country-pair	United States	China	Other countries	
United States				
China				
<sup>1</sup> For any country-pair for which factors other than price <i>always or frequently</i> are a significant factor in your firm's sales of sebacic acid, identify the country-pair and report the advantages or disadvantages imparted by such factors:				